

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**LUIS PINTO, SJUR MADSGARD, and
FUTURE HOLDINGS ASSOCIATES,
LLC**

Plaintiffs,

v.

ALLSTATE INSURANCE COMPANY

Defendant.

Civil Action No.: 22-cv-07167

Honorable Joan B. Gottschall

Honorable Maria Valdez

JOINT STATUS REPORT

Pursuant to the Court’s February 15, 2024 Minute Entry (Dkt. 48) (referring case to Judge Valdez for discovery supervision), May 1, 2024 Minute Entry (Dkt. 56) (re-setting written status date to June 3, 2024) , and Judge Valdez’s Order Setting Initial Status Report, Plaintiffs Luis Pinto, Sjur Madsgard, and Future Holdings Associates, LLC (“Plaintiffs”) and Defendant Allstate Insurance Company (“Defendant”) submit this Joint Status Report.

1. Summary of Claims

Plaintiffs’ First Amended Complaint alleges claims against Defendant for breach of contract, fraudulent inducement, and unjust enrichment. *See* Dkt. 28. Defendant denies liability and asserts various affirmative defenses in its Answer. *See* Dkt. 26.

2. Brief Statement of Relief Sought

Plaintiffs seek (i) monetary damages not less than \$4,000,000; (ii) a declaration that Defendant breached its agreement with Plaintiffs; (iii) punitive damages; (iv) pre- and post-judgment interest; (v) attorneys’ fees, expenses, and costs; and (vi) “all other and further relief that this Court deems appropriate.” *See* Dkt. 28.

3. Description of Matter Referred to the Judge

This matter was referred to Magistrate Judge Valdez “for discovery supervision and any settlement conference she deems appropriate.” *See* Dkt. 45; *see also* Dkt. 48.

4. Status of Briefing

There are no outstanding motions pending before the Court. Neither party has moved to compel discovery. On April 30, Plaintiffs moved to extend the discovery deadline, *see* Dkt. 55, which the Court denied as moot. *See* Dkt. 56. On May 8, Defendant moved to dismiss for lack of prosecution. Dkt. 57. Defendant subsequently withdrew its motion on May 15. Dkts. 59-60.

5. Description of Discovery Submitted and Contemplated

The Parties have propounded, and responded to, written discovery requests. Each party has made one document production. No depositions have been taken or scheduled. The parties have scheduled a meet and confer for June 4, 2024, to discuss a plan for the completion of fact discovery. The deadline to complete fact discovery is July 1, 2024. *See* Dkt. 56.

6. Trial by Magistrate Judge

The Parties do not consent to trial before a magistrate judge.

7. Court Deadlines

The following deadlines are in effect pursuant to Judge Gottschall’s February 15 Order. *See* Dkt. 46.

Task	Amended Deadline
Completion of Fact Discovery	07/01/2024
Exchange of Initial Expert Reports	07/31/2024
Exchange of Rebuttal Expert Reports	09/02/2024
Completion of Expert Witnesses	10/31/2024

Dispositive Motions Due	12/02/202
-------------------------	-----------

8. Settlement Negotiations

The Parties briefly discussed settlement in May but did not come to an agreement.

Respectfully Submitted,

Dated: June 3, 2024

/s/ Robert F. Dicello

Robert F. Dicello
Rachel L. Bussett
Adam J. Levitt
DICELO LEVITT GUTZLER LLC
Ten North Dearborn Street, Sixth Floor
Chicago, Illinois 60602
(312) 214-7900
rfdicello@dicellolevitt.com
rbussett@dicellolevitt.com
alevitt@dicellolevitt.com

*Counsel for Plaintiffs Luis Pinto, Sjur
Madsgard, and Future Holdings Associates,
LLC*

/s/ J. Scott Humphrey

J. Scott Humphrey
Kate Watson Moss
Samantha Roth
Benesch, Friedlander, Coplan & Aronoff
LLP
71 South Wacker Drive, Suite 1600
Chicago, Illinois 60606-4637
312.212.4949
shumphrey@beneschlaw.com
kwatsonmoss@beneschlaw.com
sroth@beneschlaw.com

*Counsel for Defendant Allstate Insurance
Company*

CERTIFICATE OF SERVICE

I hereby certify that on June 3, 2024 a copy of the foregoing JOINT STATUS REPORT was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

/s/ J. Scott Humphrey
J. Scott Humphrey

Attorney for Defendant